

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ASSATA ACEY

Plaintiff,

v.

INDUCTEV

Defendant.

Case No.: 2:23-cv-01438

Judge Paul S. Diamond

DECLARATION OF RANDALL C. SCHAUER

I, Randall C. Schauer, do hereby state and declare as follows:

1. I am an attorney duly licensed to practice law in Pennsylvania and the United States District Court for the Eastern District of Pennsylvania. I am a partner at the law firm of Fox Rothschild LLP and submit this declaration in support of the Motion for Summary Judgment of Defendant InductEV (“Defendant”). I have personal knowledge of the matters contained in this declaration and, if called and sworn as a witness, I could and would competently testify to all the matters contained herein.

2. Attached hereto as “**Exhibit 1**” are true and accurate excerpts of the 4/11/2024 deposition of Assata Acey.

3. Attached hereto as “**Exhibit 2**” are true and accurate excerpts of the 4/18/2024 deposition of Assata Acey.

4. Attached hereto as “**Exhibit 3**” are true and accurate excerpts of the deposition of Jacqueline Acey.

5. Attached hereto as “**Exhibit 4**” are true and accurate excerpts of the deposition of Patty Rensel.

6. Attached hereto as “**Exhibit 5**” are true and accurate excerpts of the deposition of Omar Jackson.

7. Attached hereto as “**Exhibit 6**” are true and accurate excerpts of the deposition of Maria Tabbutt.

8. Attached hereto as “**Exhibit 7**” are true and accurate excerpts of the deposition of Daniel Hackman.

9. Attached hereto as “**Exhibit 8**” is a true and accurate copy of the Plaintiff’s May 8, 2022 complaint to the Pennsylvania Human Relations Commission (“PHRC”).

10. Attached hereto as “**Exhibit 9**” is a true and accurate copy of Plaintiff’s June 21, 2022 amended complaint to the PHRC.

11. Attached hereto as “**Exhibit 10**” is a true and accurate copy of the June 22, 2022 PHRC Cover Letter.

12. Attached hereto as “**Exhibit 11**” are true and accurate copies of Plaintiff’s Interview Evaluation Forms.

13. Attached hereto as “**Exhibit 12**” are true and accurate copies of Plaintiff’s Third Response to Defendant’s First Set of Interrogatories to Plaintiff

14. Attached hereto as “**Exhibit 13**” is a true and accurate copy of Exhibit AA-27 introduced during Plaintiff’s deposition.

15. Attached hereto as “**Exhibit 14**” is a true and accurate copy of AA-6 introduced during Plaintiff’s deposition.

16. Attached hereto as “**Exhibit 15**” is a true and accurate copy of AA-20 introduced during Plaintiff’s deposition.

17. Attached hereto as “**Exhibit 16**” is a true and accurate copy of Plaintiff’s Amended Charge of Discrimination filed with the EEOC.

18. Attached hereto as “**Exhibit 17**” is a true and accurate copy of AA-32 introduced during Plaintiff’s deposition.

Executed this 23rd day of August, 2024

/s/ *Randall C. Schauer*
Randall C. Schauer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 23, 2024, a true and correct copy of the foregoing document was served on all parties via electronic mail per the addresses contained on the docket in this matter.

FOX ROTHSCHILD LLP

/s/ Randall C. Schauer

Randall C. Schauer, Esquire

Attorney for Defendant, InductEV